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Official Committee of Unsecured Creditors of Lehman
Brothers Holdings Inc.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	X
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Chapter 11
	:	Case No. 08-13555 (SCC)
Debtors.	:	
In re:	:	X
LEHMAN BROTHERS INC.,	:	SIPA
	:	Case No. 08-01420 (SCC)
Debtor.	:	
		X

**SUPPLEMENT TO MOTION OF LEHMAN BROTHERS HOLDINGS INC. AND
OFFICIAL COMMITTEE OF UNSECURED CREDITORS, PURSUANT TO FED. R.
BANKR. P. 9019 AND 11 U.S.C. § 105(A), FOR ENTRY OF ORDER APPROVING
SETTLEMENT WITH JPMORGAN CHASE BANK, N.A. AND CERTAIN OF ITS
AFFILIATES**

TO THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE:

In further support of the Motion Of Lehman Brothers Holdings Inc. And Official Committee Of Unsecured Creditors, Pursuant To Fed. R. Bankr. P. 9019 And 11 U.S.C. § 105(A), For Entry Of Order Approving Settlement With JPMorgan Chase Bank, N.A. And Certain Of Its Affiliates, filed February 1, 2017 [ECF No. 54683] (the “Motion”), the Plan Administrator¹ respectfully states the following:

¹ Capitalized terms that are used but not defined herein have the meanings ascribed to them in the Motion.

1. In the Motion, the Plan Administrator noted that one of the terms of the Settlement provides that:

Claims Allowance and CDA. JPMorgan's Claim No. 66462 against LBHI will be reduced, allowed in an amount consistent with the Settlement Payment and the settlement of the LBSF Action, and the 492nd Omnibus Objection, as set forth in an instruction letter (the "Instruction Letter") to be submitted to the claims agent retained in the Chapter 11 Cases: Epiq Systems Inc. (the "Claims Agent"), and deemed fully satisfied because it had been previously fully satisfied pursuant to the Collateral Disposition Agreement dated March 16, 2010 [ECF No. 7619] (as amended and supplemented from time to time, the "CDA"). Claim Nos. 66474, 66452, 66455, 66465, 66466, 66468, 66469, and 66473 will be assigned to certain of the Lehman Parties on a final basis and reconciled in amounts not to exceed \$200 million, as set forth in the Instruction Letter. All true-up and other remaining obligations of the parties under the CDA will be terminated and discharged. (Motion at 2.)

2. The amount of each claim affected by the Settlement is less than \$200 million and, thus, falls below the threshold required for Court approval under the July 18, 2012 Order Modifying Certain Existing Claims Orders [ECF No. 29505]. Nevertheless, the Plan Administrator believes it appropriate to identify the actual treatment for each of these claims. The allowed amounts of the claims mentioned in the preceding paragraph are as follows:

- Claim No. 66474 – to be expunged upon approval of the Settlement;
- Claim No. 66452 – to be expunged upon approval of the Settlement;
- Claim No. 66455 – this claim is comprised of 2 parts. The first part had been previously allowed against LBSF in the amount of \$663,027,962. The Settlement has no effect on this aspect of this claim. The second part of this claim is comprised of miscellaneous claims against LBSF that will be expunged upon approval of the Settlement;
- Claim No. 66465 – allowed at \$28,615;
- Claim No. 66466 – allowed at \$6,037;
- Claim No. 66468 – allowed at \$37,000;

- Claim No. 66469 – allowed at \$11,046; and
- Claim No. 66473 – allowed at \$50,583.

3. The foregoing amounts are also reflected in the Lehman claims register.

Dated: February 9, 2017
New York, New York

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ Andrew J. Rossman

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